Tom.Perina@CH2M.com
05/12/2005 09:08 AM

To Christopher Lichens/R9/USEPA/US@EPA
cc
bcc
Subject B.2 comment

History: This message has been forwarded.

Chris,

this is the additional comment on Section B.2, p. B-5, as we discussed yesterday:

The text states that Region IX PRGs for tap water assume ingestion during residential land use, and that the groundwater within the contaminated are is not currently being used and is unlikely to be used in the future because of high TDS. The text then speculates on future land use of the site remaining commercial/industrial.
The State Antidegradation Policy (State Water Resources Control Board Resolution No. 68-16), adapted in the Water Quality Control Plan, Los Angeles Region (Basin Plan) does not allow the degradation of the quality of existing groundwater, regardless of whether the existing groundwater meets the Water Quality Objectives specified in the Basin Plan. The high TDS of the shallow groundwater within the Phase 1a Area is such existing, local condition. The shallow groundwater beneath the site has to be considered a part of the entire aquifer system. The Omega site is located within a recharge area of the Los Angeles Basin where vertical mixing of atmospheric water occurs to the depths of regional aquifers (Reichard et al., 2003). Consequently, contamination in shallow groundwater within this area can impact drinking water aquifers in the basin.

Stan and Rich should also look at this and specify a risk assessment requirement.

Tom

Reichard, E.G., M. Land, S.M. Crawford, T. Johnson, R.R. Everett, T.V. Kulshan, D.J. Ponti, K.J. Halford, T.A. Johnson, K.S. Paybins, and T. Nishikawa. 2003. Geohydrology, geochemistry, and ground-water simulation-optimization of the Central and West Coast Basins, Los Angeles County, California. U.S. Geological Survey, Water-Resources Investigations Report 03-4065.